

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D. C. 20036

(202) 955-9600

NEW YORK, N.Y.

LOS ANGELES, CA.

MIAMI, FL.

CHICAGO, IL.

STAMFORD, CT.

PARSIPPANY, N.J.

BRUSSELS, BELGIUM

HONG KONG

AFFILIATED OFFICES

NEW DELHI, INDIA

TOKYO, JAPAN

DOCKET FILE COPY

FACSIMILE

(202) 955-9792

WRITER'S DIRECT LINE

(202) 955-9608

EX PARTE OR LATE FILED

January 16, 1998

RECEIVED

JAN 20 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: OSP Reform (CC Docket 92-77)

Dear Ms. Salas:

On behalf of Intellicall, Inc. ("Intellicall"), please take notice that on January 16, 1998, we met with Kevin J. Martin, Legal Advisor to Commissioner Furchtgott-Roth to discuss Intellicall's position in this docket. Representing Intellicall were Judith St. Ledger-Roty and myself from Kelley Drye & Warren LLP, and B. Reid Presson. The attached document summarizing the presentation was distributed to Mr. Power. Intellicall requested that the Commission either (1) allow store and forward payphones to provide a rate quote via a separate call (an audible would still be provided) or (2) provide a transition period pursuant to which (a) store and forward phones that could be modified to private rate quotes do so within 15 months of the effective date of the rules and (b) store and forward phones that cannot be modified must be replaced within 3 years.

At the meeting, Mr. Martin inquired whether the *0 capability from Intellicall phones would connect a caller to a rate quote even if it were dialed after the 0+ bong and audible disclosure. After the meeting, the undersigned counsel learned that *0 does not presently issue a disconnect signal prior to dialing the appropriate rate quote number. Accordingly, callers currently would have to hang up before dialing *0. Intellicall is studying whether it will be possible to modify its equipment this way.

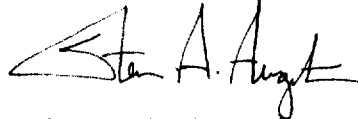
No. of Copies rec'd 04
List A B C D E

KELLEY DRYE & WARREN LLP

Magalie R. Salas, Secretary
December 22, 1997
Page 2

In accordance with Section 1.1206 of the Commission's rules, an original and one copy of this notice are provided for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven A. Augustino". The signature is stylized with a large, sweeping initial "S" and a long, horizontal stroke at the end.

Steven A. Augustino

Attachment

cc: Mr. Martin

STORE AND FORWARD PAYPHONE TECHNOLOGY

- **Equipment-based provision of pay telephone operator services. Payphone owner is the operator service provider for regulatory purposes.**
- **"Smart" microprocessor technology located within the payphone performs call processing and collects billing information without the need for live operators.**
- **Payphone performs automated call completion and stores call detail records for later processing. Call detail records periodically are "forwarded" to a central location for rating and billing. CALL RATING IS NOT PERFORMED WITHIN THE PHONE.**
- **Store and forward payphones can handle all types of O+ calls, including automated calling card, collect and third-party billed calls.**

INTELLICALL, INC. PAYPHONE PRODUCTS

Intellicall is a pioneer in intelligent payphone equipment and automated call processing service technologies. It is a worldwide provider of payphones and network platform-based products designed to operate, manage, monitor and modify payphone systems.

UltraTel

- Introduced in 1987; no longer in production
- Pioneer in "smart" payphones
- Limited computing capacity
- No unused internal memory or expansion capabilities
- Requires separate AC electrical power source
- Substantial majority of Intellicall's embedded base

AstraTel 2

- Introduced in late 1996
- Most advanced technology available
- Enhanced automated processing features, including timed local call rating, automated customer refunds, and bilingual voice prompts
- Expandable memory
- Line-powered; a separate power source is not needed

IMPACT OF PROPOSALS ON INTELLICALL PAY TELEPHONE PRODUCTS

UltraTel

- Embedded base must be replaced to comply with proposals
- Cannot provide rate quote within the phone. Caller must dial a separate call to receive a rate quote
- Insufficient memory to store rate tables in phone; memory cannot be expanded
- Speech file can be modified at relatively little cost to announce that rates are available by dialing *0 (star-zero)

AstraTel 2

- Rate tables are not presently stored in the phone; significant additional memory would need to be added and rate structures probably will need to be simplified
- Lead time of up to 14 months will be necessary to design, test and implement capability to provide rate quote on a single call
- Cost of compliance would be significantly reduced if a separate call to receive a rate quote were acceptable
- Speech file can be modified at relatively little cost to announce that rates are available by dialing *0 (star-zero)

PROPOSED ACTION REGARDING EMBEDDED STORE AND FORWARD PHONES

UltraTel

(and similar technology phones)

- Grandfather existing phones for remaining useful life
or
- Exempt store and forward OSPs from the requirement
that rates be provided on the same call

AstraTel 2

(and similar technology phones)

- Exempt store and forward OSPs from the requirement
that rates be provided on the same call
or
- Allow a reasonable time period before existing
equipment and new installations must be in full
compliance

Intellicall

Overview

Intellicall is a worldwide provider of payphones and payphone network platform-based products designed to operate, manage, monitor and modify payphone systems. A technology leader in its industry, Intellicall is a pioneer in intelligent payphones and state-of-the-art platforms for call processing, network control, and system management. Intellicall's technology and services offer payphone service providers what they need to make their networks more efficient.

Intellicall provides automated operator services for independent payphone providers, the hospitality and inmate services industries, and prepaid calling services. Intellicall offers resale of direct dial long distance services, and live operator services through its subsidiary, ILD Communications Inc. Prepaid telecommunications services are provided through retail distribution outlets and for premiums and promotions.

Payphone Products/ Services

Intellicall's intelligent payphone, the AstraTel-2, incorporates advanced microprocessor technology that internally performs all functions associated with placing a phone call. Operational software and features of these payphones may be modified from a remote location by means of proprietary software.

Program upgrades performed remotely reduce the risk of obsolescence and permit rapid response to regulatory and market changes. Management and diagnostic tools increase efficiency by allowing payphone providers to eliminate unnecessary coin collection and service calls to the pay telephone location.

The AstraTel-2 is equipped with Intelli*Star™, an automated operator product licensed to payphone owners. Intelli*Star is a patented combination of hardware and software that performs, without human intervention, all of the functions necessary for completing calling card, credit card and collect phone calls.

By providing automated operator functions, the AstraTel-2 substantially reduces the need for an operator-assisted call to be routed first to a live operator service. Intelli*Star allows payphone owners to provide operator services more efficiently and profitably than a centralized operator service provider, and at a lower cost to the consumer. Intellicall offers billing and collection services to payphone providers who use Intelli*Star.

Network Applications

Intellicall's Intelligent Network Platform technology provides enhanced public access services to network operators in the United States and abroad. Public access services are of special importance to network operators in developing countries where public demand for telephone service far outstrips line availability.

Platform applications include prepaid calling (PIN) service, prepaid cellular service and enhanced public phone management. Network operators may run one or more of these services simultaneously on the same platform. The platform can provide automated credit card validation, calling card and voice recognition validation in conjunction with the public access services.

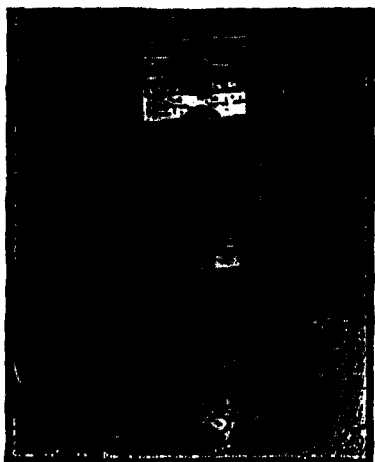
Additional Services

Prepaid calling services — Intellicall offers prepaid calling services, including private label phone cards, through its Intelligent Network Platform technology to major retailers with established distribution channels. To take part in the rapidly growing market for prepaid calling service, the company is expanding its customer base, selling prepaid services at more than 800 retail outlets throughout the United States and Puerto Rico.

Calls may originate and terminate in all 50 states, Puerto Rico and the U.S. Virgin Islands. Calls originating in the United States may also terminate in more than 200 foreign countries.

Live operator services — Intellicall, through ILD, provides live operator services, both domestic and international, for pay telephones, hotels, and correctional facilities.

Long-distance resale — Intellicall, through ILD, offers switched and dedicated 1+ services under various reseller agreements. Intellicall buys services in bulk for its own use and for resale by ILD to its customers at negotiated rates.



ASTRATEL 2™ Model 15120 Coin Phone

You're in the business to succeed. We're in the business to make sure that you do. At Intellicall, we offer the technology and services you need to make your networks more efficient. Intelligent technology and smart business sense. Combined, they can make you succeed like nobody's business. Here's one product that shows you how advanced technology makes it simple.

Intellicall's ASTRATEL 2 is the most advanced, line-powered smart payphone system in the industry. The highly integrated electronics are simple, compact and reliable. And ASTRATEL 2 is loaded with features and flexibility so you can configure the phone to operate your way. Finally, a line-powered phone that's simple to own and maintain.

Profit faster.

14.4K bps /V.32 bis modem - V.42/V.42 bis error correction and data compression make communication speed for transferring call detail records from ASTRATEL 2 ten times faster than anything on the market. Rate tables are updated in less than 30 seconds and total programs in less than five minutes so you profit that much faster. Faster communication also means lower operating costs. Plus, the ASTRATEL 2 has more horsepower to adapt where others must be upgraded.

Generate more revenue.

IntelliStar store and forward - Incorporates advanced microprocessor technology that internally performs all functions associated with placing a 0+ phone call. This patented process automates 0+ calls and dials the calls as 1+ so you collect the difference. And you control your 0+ traffic rather than relying on outside service providers - all with no additional hardware.

International coin calls - enables lucrative coin calls to international countries and protects you from fraud. The ASTRATEL 2 dials into the Intellicall network which monitors the call to ensure coins continue to

Get accurate dial-around compensation.

Call detail records - allows you the option of tracking every call to determine accurate dial-around compensation amounts, and it provides the data needed to reconcile dial-around compensation.

Get paid for local calls.

Timed local calls - measured service for local timed calls protects phone owners from not getting paid. Callers are prompted to pay before they use the time instead of after. No more walk-aways.

ASTRATEL 2 saves you money with these features:

Optional Electronic Coin Handling System (ECHS) - our patented anti-stuffing device coupled with the Mars MS16 electronic coin validator eliminates almost all coin jams and coin chute stuffing by capturing foreign objects inserted in the coin slot.

211 automated customer refund service - provides immediate customer service. Callers dial customer service directly and the 211 operators are provided with a call detail record to review the last transaction to credit customers immediately with another call. No more mailing out 25 cent checks.

Coin collection alarms and cash box totals - monitors for unauthorized entry and generates automatic call-outs during cash box collections to identify time of coin collection and coin totals. Automated service calls and collections to eliminate unnecessary coin collection and service calls, alarm call-outs are generated that identify immediate service requirements such as full coin box, missing handset, low activity, coin jam, or system/software problems.

Service callout - allows the service technician in the field to request a download of rates and program the phone without the assistance of office personnel.

Upgrade and adapter kits - available to upgrade most existing payphones including: Elcotel, Protel and Ultratel.



ASTRATEL 2™ Card Reader Options

factory installed daughter board. Operators can switch between the services as well as modify features and perform program upgrades from a remote location. Here are additional features that make this smart phone a smart choice:

Line powered - power management technology delivers features through the phone line formerly only available on AC powered phones.

Intelligent management and maintenance - ASTRATEL 2 is compatible with the Intellicall INET phone management system. INET may be used on a central PC to connect with up to four ASTRATEL phones simultaneously to download rate tables, software and speech files and program phone operation relative to dialing patterns, outpulse rules, coin rating and emergency or service numbers.

Security - heavy 12 gauge plates built into the keypad and the hook switch reduce maintenance and downtime caused by vandalism or theft. The ASTRATEL 2 contains a single PC board fully encased in a reinforced ABS plastic housing that fits easily in GTE and AT&T style housings. And the single board design reduces the number of spares no matter what model you're using.

Powerful electronics - the ASTRATEL 2 PC board uses a 32-bit microprocessor and a Digital Signal Processor to perform functions faster and allow for more sophisticated programming techniques.

The ASTRATEL 2 provides improved network management and revenue-generating features not practical using an 8-bit processor such as:

- Spanish and English voice prompts built-in. ASTRATEL 2 is the only smart phone that allows you to program the phone to provide the user with either language or both.
- Larger rate tables to provide more accurate rating and special features.
- Improved answer detection and state-of-the-art Digital Signal Processing technology.
- Handset Amplifier Module built-in to the board.

Intelligent technology. Brilliant business sense. Combined, it's what can make you succeed like nobody's business. That's smart. That's Intellicall.

OPTIONS

Coin handling - ASTRATEL 2 may be fitted with mechanical or electronic coin mechanisms.

IntelliStar - Intellicall's patented store and forward technology requires no additional hardware in the ASTRATEL 2 phone.

Card reader options - phones may be ordered from the factory with card readers.

Housing options - Intellicall T-II

Coin line interface - Interface to Bell coin-lines instead of COCOT lines.

SPECIFICATIONS

Operating temperature
-30 to 60°C

Operating humidity
10-90 percent relative

Power
telephone line

Certifications
FCC Number - EHSUSA-24053-CC-E

Ringer equivalence
0.18

Dimensions
21 x 8 x 6 inches

Weight
45 lbs.

Processor
32-bit, low voltage

MEMORY

RAM
1 MB, expandable up to 2MB

ROM
2 MB, expandable up to 4MB



INTELLICALL

2155 Chenault, Suite 410



INTELLICALL
The smart ones.

ASTRATEL

Kit



ASTRATEL 2™ Smart Payphone Upgrade Kit

You're in the business to succeed. We're in the business to make sure that you do. At Intellicall, we offer the technology and services you need to make your networks more efficient. Intelligent technology and smart business sense. Combined, they can make you succeed like nobody's business. Upgrade your payphones with ASTRATEL 2 and see how advanced technology makes it simple.

Once you upgrade your dumb phones to Intellicall's ASTRATEL 2, you'll have the most advanced, line-powered smart payphone system in the industry. The highly integrated electronics are simple, compact and reliable. And ASTRATEL 2 is loaded with features and flexibility so you can configure the phone to operate your way. Finally, a line-powered phone that's simple to own and maintain.

14.4K bps /V.32 bis modem - V.42/V.42 bis error correction and data compression make communication speed for transferring call detail records from ASTRATEL 2 ten times faster than anything on the market. Rate tables are updated in less than 30 seconds and total programs in less than five minutes so you profit that much faster. Faster communication also means lower operating costs.

Features

Call detail records - allows you the option of tracking every call to determine accurate dial-around compensation amounts, and it provides the data needed to reconcile dial-around compensation.

Intelli*Star store and forward -

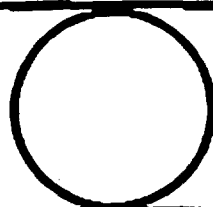
Incorporates advanced microprocessor technology that internally performs all functions associated with placing a 0+ phone call. This patented process automates 0+ calls and dials the calls as 1+ so you collect the difference. And you control your 0+ traffic rather than relying on outside service providers all with no additional hardware.

Timed local calls - measured service for local timed calls protects phone owners from not getting paid. Callers are prompted to pay before they use the time instead of after. This feature eliminates walk-aways.

International coin calls - enables lucrative coin calls to international countries and protects you from fraud. The ASTRATEL 2 dials into the Intellicall network which monitors the call to ensure coins continue to be collected. If the line is tampered with, the call is disconnected.

Single board - PC board fully encased in a reinforced ABS plastic housing that fits easily in GTE, AT&T and Northern Telecom style housings. The single board design reduces the number of spares no matter what housing you're using. Plus, it has more horsepower to adapt where others must be upgraded.

Adaptability - Intellicall offers adapter kits to allow the ASTRATEL 2 Kit to work with existing dumb or smart phones. The A2 Kit is compatible with 48V and 12V escrow relays and automatically adapts to the relay. Adapter kits are available for: Protel, Elcotel, Western Electric housings, Centurion housings, and GTE housings.



More Features

Line powered - power management technology delivers features through the phone line formerly only available on AC powered phones.

211 automated customer refund service - provides immediate customer service. Callers dial customer service directly and the 211 operators are provided with a call detail record to review the last transaction to credit customers immediately with another call. No more mailing out 25 cent checks.

Coin collection alarms and cash box totals - monitors for unauthorized entry and generates automatic call-outs during cash box collections to identify time of coin collection and coin totals.

Automated service calls and collection - to eliminate unnecessary coin collection and service calls, alarm call-outs are generated that identify immediate service requirements such as full coin box, missing handset, low activity, coin jam, or system/software problems.

Built-in Spanish and English voice prompts - the only smart phone that allows you to program the phone to provide the user with either language or both.

Intelligent technology. Brilliant business sense. Combined, it's what can make you succeed like nobody's business. That's smart. That's Intellicall.

OPTIONS

Coin handling - ASTRATEL 2 may be fitted with mechanical or electronic coin mechanisms.

IntelliStar - Intellicall's patented store and forward technology requires no additional hardware in the ASTRATEL 2 phone.

Housing Options -

- Western Electric Style
- GTE style
- Dynacom
- Intellicall Panel Mount
- Intellicall T-III
- Quadrup
- Northern Telecom Centurion

SPECIFICATIONS

Operating Temperature
-30 to 60°C

Operating Humidity
10-90 percent relative

Power
telephone line

Certifications
FCC Number - EHSUSA-24053-CC-E

Ringer Equivalence
0.1B

Dimensions
12.4 x 4.7 x 1.8 inches

Weight
2 lbs.

Processor
32-bit, low voltage

Memory

RAM
1 MB, expandable up to 2MB

ROM
2 MB, expandable up to 4MB



INTELLICALL

2155 Chenault, Suite 410
Carrollton, Texas 75006-5021
972.416 0022